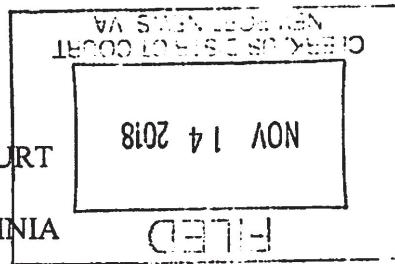


SC District Court Criminal No.: 2:19-cr-00683



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Newport News Division

| | | |
|--------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA |) | Criminal No. 4:18CR 80 |
| |) | |
| v. |) | 18 U.S.C. §2252A (a)(2) |
| |) | Attempted Distribution of Child |
| | | Pornography |
| ROBERT LESTER ADKISON |) | (Count 1) |
| |) | |
| |) | 18 U.S.C. §2252A (a)(2) |
| |) | Receipt of Child Pornography |
| |) | (Counts 2-9) |
| |) | |
| |) | 18 U.S.C. § 2253 |
| |) | Forfeiture |

INDICTMENT

November 2018 Term - At Newport News, Virginia

COUNT ONE**THE GRAND JURY CHARGES THAT:**

On or about December 17, 2017, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, did knowingly attempt to distribute material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: an image entitled "image.jpg", depicting a toddler female child engaging in sexually explicit conduct, specifically, actual and simulated lascivious exhibition of the genitals or the pubic area of the child, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT TWO**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 27, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “_dad on daughter full penetration sex.mpg”, depicting a prepubescent female child engaging in sexually explicit conduct, specifically, actual and simulated genital-genital sexual intercourse by a prepubescent female child with an adult male and oral-genital intercourse by a prepubescent female child on an adult male, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT THREE**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 6, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “Babyshivid-chairraped.avi,” depicting a female toddler child engaging in sexually explicit conduct, specifically, actual and simulated masturbation of the female toddler child by an adult male and genital-genital sexual intercourse by an adult male with a toddler female child, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled "boy07.mpg," depicting two prepubescent males children engaging in sexually explicit conduct, specifically, actual and simulated oral-genital sexual intercourse by an adult male with a prepubescent male child, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled "Kbaby – Cumfest.wmv", depicting a prepubescent female child engaging in sexually explicit conduct, specifically, actual and simulated masturbation of the adult male by the prepubescent female child and oral-genital sexual intercourse by the prepubescent female child with an adult male, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8); to wit: a video entitled “--5yo boy Exéllent Cock Sucker.mpg”, depicting a prepubescent male child engaging in sexually explicit conduct, specifically, actual and simulated oral-genital sexual intercourse by a prepubescent male child with an adult male and anal-genital intercourse by a prepubescent male child on an adult male, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “girl32.avi”, depicting a prepubescent female child engaging in sexually explicit conduct, specifically, actual and simulated genital-genital sexual intercourse by a prepubescent female child with an adult male, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “8yo_Blow_Job-Serious_Cum_Shot.avi”, depicting a prepubescent female child engaging in sexually explicit conduct, specifically, actual and simulated oral-genital intercourse by a prepubescent female child on an adult male, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2018, in the Eastern District of Virginia, the defendant, ROBERT LESTER ADKISON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a video entitled “boy09.mpg”, depicting a prepubescent male child engaging in sexually explicit conduct, specifically, actual and simulated oral-genital intercourse by a prepubescent male child on an adult male, that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

FORFEITURE

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of any of the violations alleged in Counts 1 through 9 of this Indictment, the defendant shall forfeit the following property to the United States as part of his sentencing:

a. any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

b. any and all property, real or personal, used or intended to be used to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property; and

c. any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*.

2. If any property that is subject to forfeiture, as a result of any act or omission of the defendant (i) cannot be located upon the exercise of due diligence, (ii) has been transferred to, sold to, or deposited with a third party, (iii) has been placed beyond the jurisdiction of the Court, (iv) has been substantially diminished in value, or (v) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

3. The property subject to forfeiture includes, but is not limited to, the following:

- * ZTE cell phone, model Z981, IMEI number 864792033543775 with SanDisk MicroSD card: and,
- * RCA Tablet, Model RCT6203W46 with no serial number.

(In accordance with Title 18, United States Code, Section 2253).

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

UNITED STATES v. ROBERT LESTER ADKISON

Criminal No. : 4:18cr**816**

A TRUE BILL:

REDACTED COPY

FOREPERSON

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY



Lisa R. McKeel
Assistant United States Attorney